

LILLIAN CEASOR

: SUIT NUMBER: 50422(A)

VERSUS

: 7<sup>TH</sup> JUDICIAL DISTRICT COURT

AMERICAN INTER-FIDELITY  
EXCHANGE, AMEGA HOLDINGS, INC.  
and JORDAN D. VERNDELL

: CONCORDIA PARISH, LOUISIANA

FILED 1/20/17  
BY 3/15/17  
Deputy Clerk of Court

PETITION

LILLIAN CEASOR, of the full age of majority and domiciled in Concordia Parish, Louisiana, respectfully represent:

1.

The defendants making this petition necessary are:

- a. AMERICAN INTER-FIDELITY EXCHANGE, a foreign insurer who at all times material herin provided liability coverage to Amega Holdings, Inc.;
- b. AMEGA HOLDINGS, INC., a Missouri corporation authorized to do and doing business in the State of Louisiana; and
- c. JORDAN D. VERNDELL, domiciled in Lowndes County, Mississippi.

2.

On March 4<sup>th</sup>, 2016, a wreck occurred at the intersection of Highway 425 and Highway 65 in Concordia Parish, Louisiana, involving a 2014 Ford Focus, owned and operated by plaintiff, Lillian Ceasor, and an 18-wheeler tractor trailer, owned by defendant Amega Holdings, Inc., and operated by defendant Jordan D. Verndell,

3.

The intersection of Highway 425 and Highway 65 was governed by a stop sign.

4.

Jordan D. Verndell was required to stop at the stop sign and enter the intersection when safe.

5.

Jordan D. Verndell drove his 18-wheeler into the intersection when LILLIAN CEASOR's vehicle was too close to avoid a collision.

6.

At the time Jordan D. Verndell drove into the intersection, he understood that if he did not have enough space to safely cross, it could injure other drivers.

A TRUE COPY  
ATTEST  
Verndell  
DEPUTY CLERK OF COURT  
CONCORDIA PARISH, LA

BY 3/15/17  
2017 JAN 30 AM 10  
FILED

7.

Jordan D. Verndell endangered the public and caused plaintiff's harm by:

- a. Failing to maintain a proper lookout;
- b. Failing to see what he should have seen, or in seeing, in failing to heed;
- c. Operating his truck in a careless and reckless manner; and
- d. Failing to stop at a stop sign.

8.

On information and belief, Jordan D. Verndell was in the course and scope of his employment with Amega at all times relevant herein. Amega is vicariously liable for the negligent acts of its employees.

9.

Amega had a duty to communicate, establish and enforce screening, training, and supervision procedures to prevent acts of the nature described herein. Amega's breach of this duty caused plaintiff's injuries and harm. Amega was negligent in its hiring, retention, training and supervision of its employees. This negligence was jointly a cause of plaintiff's harm.

10.

Jordan D. Verndell's reckless and negligent conduct caused harm to plaintiff. Defendants are responsible for plaintiff's past, present, and future: 1) medical expenses; 2) pain and suffering; 3) mental pain and anguish; 4) permanent injuries and disability; 5) loss of wages and economic opportunity; and 6) loss of enjoyment of life.

11.

Plaintiff's claims equal or exceed the amount required for trial by jury.

12.

In order to move this case forward and to ensure accuracy, notice is hereby given of the intent to depose the following individuals in advance of deposition of the plaintiff: Officer John Mitchell of the Concordia Parish Sheriff's Office; Officer Terry Thames of the Concordia Parish Sheriff's Office; and Jordan D. Verndell.

---

WHEREFORE, plaintiff prays that all harms and losses caused by defendants be repaired by judgment; all expert fees, costs, and interest should be borne by defendants.

Respectfully Submitted,

MORRIS, DEWETT & SAVOIE, LLC

By:   
TREY MORRIS, APLC (#28162)  
509 Milan Street  
Shreveport, LA 71101  
(318) 221-1507 - Telephone  
(318) 221-4560 - Facsimile  
[btmorriss@shreveportlaw.net](mailto:btmorriss@shreveportlaw.net)  
ATTORNEY FOR PLAINTIFF

**Please Serve:**

**AMERICAN INTER-FIDELITY EXCHANGE**

Via Louisiana Long-Arm Statute  
Through its Agent for Service of Process  
Lex Venditti  
9223 Broadway, Suite A  
Merrillville, Indiana 46410

**AMEGA HOLDINGS, INC.**

Via Louisiana Long-Arm Statute  
Through Its Agent for Service of Process:  
Thomas M Harrison  
1103 East Broadway Ste. 101  
Columbia, MO 65201

**JORDAN D. VERNDELL**

Via Louisiana Long-Arm Statute  
1099 Tabernacle Road  
Columbus, Mississippi 39702